

# EXHIBIT A



August 27, 2021

**VIA FACSIMILE: (615)-694-5242**

Dollar General

P.O. Box 171728

Goodlettsville, TN 37070

**CONFIDENTIAL DEMAND LETTER  
SUBJECT TO RULE 408 OF THE TEXAS RULES OF EVIDENCE**

**Re:** *Jose Rodolfo Cardoza*

**Date of Incident:** *July 6, 2021*

**Claim Number:** *202109645*

Greetings,

As you know, our firm represents **Jose Rodolfo Cardoza** in connection with the above referenced matter. This case arises from a slip and fall incident that occurred on or about July 6, 2021, at the Dollar General located at 615 S Standard St, San Juan, Texas, Hidalgo County.

**BASIS OF THE CLAIM**

On or about July 6, 2021, Jose Rodolfo Cardoza entered Dollar General for the mutual benefit of both Jose Rodolfo Cardoza and Dollar General. While Mr. Cardoza was shopping through the Isles of the store, he slipped on a puddle of water on the floor causing him to fall backwards. When Mr. Cardoza fell, the brace of impact caused him to break this thumb from his right hand. There were no signs that could have warned Mr. Cardoza of the dangerous condition. Dollar General knew or reasonably should have known of the dangerous condition but failed to warn or make the condition reasonably safe for Mr. Cardoza.

Based on our investigation and the information gathered, liability is clear. Dollar General owed a duty to Mr. Cardoza to use reasonable care, including the duty to protect and safeguard Mr. Ramirez from unreasonably dangerous conditions on the premises. Dollar General breached that duty by failing to remedy or warn Mr. Cardoza of the dangerous conditions. We will prove and establish liability, causation, and damages in this case and secure a favorable verdict in Hidalgo County, Texas. The jury will consider the following damages:

- Past and future medical care and expenses;

- Past and future pain and suffering;
- Past and future mental anguish;
- Loss of future earning capacity;
- Physical impairment; and
- Disfigurement.

On behalf of Mr. Cardoza, we hereby make a settlement demand of **One Million Dollars (\$1,000,000.00)**. This is an unconditional demand made in exchange for an unconditional release, as an offer to resolve any and all claims against Dollar General, which could be made through, or under Jose Rodolfo Cardoza, pursuant to **Bleeker v. Trinity Universal Life**, if accepted in writing on or before **September 10, 2021**, at noon. This demand is reasonable considering the facts of the case.

The following cases require you to negotiate in good faith on behalf of your insured and accept a reasonable settlement demand within your policy limits in order to protect your insured from any exposure in excess of the policy limit. *G. & A. Stowers Furniture Company v. American Indemnity Company*, 15 S.W.2d 544 (Tex. Comm'n. App. 1929); *Ranger County Mutual Insurance Company v. Guin*, 723 S.W.2d 656 (Tex. 1987).

We look forward to hearing from you soon. If you have any further questions or require anything else to assist you in your evaluation of this claim, please do not hesitate to contact our office.

Respectfully,

**ZAMBRANO LAW FIRM**



Jesus A. Zambrano

Encls.